

EXHIBIT A

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 IN RE CATHODE RAY TUBE (CRT)) Master File No. 3:07-cv-5944 SC
14 ANTITRUST LITIGATION)
15 _____) MDL No. 1917
This Document Relates to:)
16 Indirect Purchaser Class Action)
17 _____)
18 _____)
19 _____)
The Honorable Samuel Conti
_____)

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1 The Indirect Purchaser Class Plaintiffs (“Plaintiffs”) submit their proposed special verdict
 2 form pertaining to their state antitrust and consumer protection claims. Plaintiffs reserve the right
 3 to amend, supplement, or otherwise revise this verdict form as appropriate following the Court’s
 4 rulings on any pending or pretrial motions, a final determination as to the manner in which these
 5 cases will be tried, or as is otherwise reasonable and appropriate.

6

7 We the Jury find as follows:

8

Question No. 1

9 Did any of the Defendants and Co-Conspirators listed below participate in a conspiracy to
 10 fix, raise, maintain, or stabilize prices for CRTs in violation of the antitrust laws of one or more of
 11 the following states: Arizona, California, Iowa, Kansas, Maine, Michigan, Minnesota, Mississippi,
 12 Nebraska, Nevada, New Mexico, New York, North Carolina, North Dakota, South Dakota,
 13 Tennessee, Vermont, West Virginia, Wisconsin, or the District of Columbia?

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Chunghwa	YES _____	NO _____
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Daewoo/Orion	YES _____	NO _____
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16

Hitachi	YES _____	NO _____
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17

IRICO	YES _____	NO _____
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18

LG Electronics	YES _____	NO _____
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LG.Philips Displays	YES _____	NO _____
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LP Displays	YES _____	NO _____
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Mitsubishi	YES _____	NO _____
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22

Panasonic	YES _____	NO _____
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23

MT Picture Display	YES _____	NO _____
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24

BMCC	YES _____	NO _____
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25

Philips	YES _____	NO _____
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Samsung	YES _____	NO _____
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Samtel	YES _____	NO _____
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Thai CRT	YES _____	NO _____
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1 **Thomson** YES _____ NO _____

2 **Toshiba** YES _____ NO _____

3 **Videocon** YES _____ NO _____

4 (*If you answered "Yes" to Question No. 1 for one or more of the Defendants and Co-Conspirators,*
5 *please continue to Question No. 2. If you answered "No" to this question, please proceed to*
6 *Question No. 7.*)

7 **Question No. 2**

8 Did the Defendants and Co-Conspirators injure the class members by the conspiracy?

9 YES _____ NO _____

10 (*If you answered "Yes" to Question No. 2, please continue to Question No. 3. If you answered*
11 *"No" to this question, your work is done, do not answer any other questions and please sign the*
12 *verdict form.*)

13 **Question No. 3**

14 Did the Defendants and Co-Conspirators fraudulently conceal the conspiracy?

15 YES _____ NO _____

16 (*If you answered "Yes" to this question, please proceed to Question No. 4; if you answered "No"*
17 *to this question, please proceed to Questions No. 5 and 6.*)

18 **Question No. 4**

19 If you find that any of the Defendants and Co-Conspirators conspired to fix, raise,
20 maintain, or stabilize prices for CRTs in violation of the antitrust laws of any one of the states
21 listed below, then for each such state, write in the amount of damages you find that the class
22 members sustained in that state as a result of the antitrust violation(s):

23 **Arizona** \$ _____

24 **California** \$ _____

25 **District of Columbia** \$ _____

26 **Hawaii** \$ _____

27 **Iowa** \$ _____

28 **Kansas** \$ _____

1	Maine	\$ _____
2	Michigan	\$ _____
3	Minnesota	\$ _____
4	Mississippi	\$ _____
5	Nebraska	\$ _____
6	Nevada	\$ _____
7	New Mexico	\$ _____
8	New York	\$ _____
9	North Carolina	\$ _____
10	North Dakota	\$ _____
11	South Dakota	\$ _____
12	Tennessee	\$ _____
13	Vermont	\$ _____
14	West Virginia	\$ _____
15	Wisconsin	\$ _____

16 (Please proceed to Question No. 7.)

17 **Question No. 5**

18 If you find that any of the Defendants and Co-Conspirators conspired to fix, raise,
19 maintain, or stabilize prices for CRTs in violation of the antitrust laws of any one of the states
20 listed below, then for each such state, write in the amount of damages you find that the class
21 members sustained in that state as a result of the antitrust violation(s), excluding any amounts for
22 purchases before November 2003:

23	Arizona	\$ _____
24	California	\$ _____
25	District of Columbia	\$ _____
26	Hawaii	\$ _____
27	Iowa	\$ _____
28	Kansas	\$ _____

1 **Michigan** \$ _____
2 **Minnesota** \$ _____
3 **Mississippi** \$ _____
4 **Nebraska** \$ _____
5 **Nevada** \$ _____
6 **New Mexico** \$ _____
7 **New York** \$ _____
8 **North Carolina** \$ _____
9 **North Dakota** \$ _____
10 **South Dakota** \$ _____
11 **Tennessee** \$ _____
12 **West Virginia** \$ _____

13 (*Please proceed to Question No. 6.*)

14 **Question No. 6**

15 For the states Maine, Vermont and Wisconsin, please write in the amount of damages that
16 the class members sustained in that state as a result of the antitrust violation(s), excluding any
17 amounts for purchases before November 2001:

18 **Maine** \$ _____
19 **Vermont** \$ _____
20 **Wisconsin** \$ _____

21 (*Please Proceed to Question No. 7.*)

22 **Question No. 7**

23 Did any of the Defendants and Co-Conspirators listed below violate the unfair trade
24 practices laws of Florida?

25 **Chunghwa** YES _____ NO _____
26 **Daewoo/Orion** YES _____ NO _____
27 **Hitachi** YES _____ NO _____
28 **IRICO** YES _____ NO _____

1	LG Electronics	YES _____	NO _____
2	LG.Philips Displays	YES _____	NO _____
3	LP Displays	YES _____	NO _____
4	Mitsubishi	YES _____	NO _____
5	Panasonic	YES _____	NO _____
6	MT Picture Display	YES _____	NO _____
7	BMCC	YES _____	NO _____
8	Philips	YES _____	NO _____
9	Samsung	YES _____	NO _____
10	Samtel	YES _____	NO _____
11	Tatung	YES _____	NO _____
12	Thai CRT	YES _____	NO _____
13	Thomson	YES _____	NO _____
14	Toshiba	YES _____	NO _____
15	Videocon	YES _____	NO _____

(If you answered “Yes” to Question No. 7 for one or more of the Defendants and Co-Conspirators and answered “No” to Question No. 1, please continue to Question No. 8. If you answered “Yes” to Question No. 7 for one or more of the Defendants and Co-Conspirators and answered “Yes” to Question No. 3, please continue to Question No. 10. If you answered “Yes” to Question No. 7 for one or more of the Defendants and answered “No” to Question No. 3, please continue to Question No. 11. If you answered “No” to Question No. 7, your work is concluded, do not answer any more questions and please sign the verdict form.)

Question No. 8

Did the Defendants and Co-Conspirators injure the class members by the conspiracy?

YES _____ **NO** _____

(If you answered “Yes” to Question No. 8, please continue to Question No. 9. If you answered “No” to this question, your work is done, do not answer any other questions and please sign the verdict form.)

Question No. 9

Did the Defendants and Co-Conspirators fraudulently conceal the conspiracy?

YES _____ **NO** _____

(If you answered “Yes” to this question, please proceed to Question No. 10; if you answered “No” to this question, please proceed to Question No. 11.)

Question No. 10

If you find that any of the Defendants and Co-Conspirators violated the consumer protection laws of Florida, then write in the amount of damages you find that the class members sustained in that state as a result of the consumer protection violation(s):

Florida \$ _____

(Please proceed to Question No. 12.)

Question No. 11

If you find that any of the Defendants and Co-Conspirators violated the consumer protection laws of Florida, then write in the amount of damages you find that the class members sustained in that state as a result of the consumer protection violation(s), excluding any amounts for purchases before November 2003:

(Please proceed to Question No. 12.)

Question No. 12

If you wrote an amount greater than zero in Questions No. 4 or No. 5 for the following states, do you find that the Defendants acted flagrantly in injuring the class members?

Arizona YES _____ NO _____

Michigan YES _____ NO _____

(Your work is concluded and please sign the verdict form.)

Dated: 2015 Jury Foreperson: